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Attorneys for Defendants Leeward Holdings, LLC, Camarillo Holdings, LLC, Dartmoor Holdings, LLC, IC Holdings, LLC, Backpage.com, LLC, Website Technologies, LLC, Amstel River Holdings, LLC, Lupine Holdings, LLC, Kickapoo River Investments, LLC, CF Holdings GP, LLC, CF Acquisitions, LLC, Carl Ferrer, Michael Lacey and James Larkin

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**SCOTT KOCHER, in his capacity as
Personal Representative of The Estate of
ASHLEY BENSON,**

PLAINTIFF,

v.

**HILTON WORLDWIDE HOLDINGS,
INC.; HILTON DOMESTIC OPERATING
COMPANY, INC.; HILTON FRANCHISE
HOLDING, LLC; WMK PORTLAND,
LCC; GRACE LIAL; MEDALIST
HOLDINGS, LLC; LEEWARD
HOLDINGS, LLC; CAMARILLO
HOLDINGS, LLC; DARTMOOR
HOLDINGS, LLC; IC HOLDINGS, LLC;
BACKPAGE.COM, LCC; UGC TECH
GROUP C.V.; WEBSITE
TECHNOLOGIES, LLC; ATLANTISCHE
BEDRIJVEN C.V.; AMSTEL RIVER**

Case No. 3:18-cv-00449-SB

**DECLARATION OF TIM
CUNNINGHAM IN SUPPORT OF
UNOPPOSED MOTION TO EXTEND
TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
PURSUANT TO FED. R. CIV. P. 6(b)**

HOLDINGS, LLC; LUPINE HOLDINGS, LLC; KICKAPOO RIVER INVESTMENTS, LLC; CF HOLDINGS GP, LLC; CF ACQUISITIONS, LLC; CARL FERRER; MICHAEL LACEY; JAMES LARKIN; AND JOHN DOES 1-5,

DEFENDANTS.

I, Tim Cunningham, depose and say:

1. I am one of the attorneys for defendants Leeward Holdings, LLC, Camarillo Holdings, LLC, Dartmoor Holdings, LLC, IC Holdings, LLC, Backpage.com, LLC, Website Technologies, LLC, Amstel River Holdings, LLC, Lupine Holdings, LLC, Kickapoo River Investments, LLC, CF Holdings GP, LLC, CF Acquisitions, LLC, Carl Ferrer, Michael Lacey and James Larkin (“Backpage defendants”) in the above-referenced case. I make this declaration on personal knowledge.

2. On Thursday March 15, 2018, I conferred with counsel for plaintiff, Janis Puracal, regarding the relief requested in this motion. Ms. Puracal informed me that plaintiff intends to move the Court for an order remanding this case to the Circuit Court of the State of Oregon, Multnomah County. Ms. Puracal agreed not to object to a request for defendants to respond to plaintiff’s complaint 10 days after the Court enters an order on plaintiff’s forthcoming motion for remand.

3. This is the Backpage defendants’ first request to the Court for an extension of time to appear and respond to the complaint.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct, and that this Declaration was executed on March 21, 2018, in Portland, Oregon.

s/ Tim Cunningham
Tim Cunningham